

KANE, PUGH, KNOELL, TROY & KRAMER LLP
BY: PAUL C. TROY, ESQUIRE
ATTORNEY I.D. NO. 60875
510 SWEDE STREET
NORRISTOWN, PA 19401
(610) 275-2000

ATTORNEY FOR DEFENDANT
Greyhound Lines, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DERRICK BRADLEY	:	NO.
	:	
v.	:	CIVIL ACTION
	:	
GREYHOUND LINES, INC.	:	

NOTICE OF REMOVAL OF DEFENDANT

Defendant, Greyhound Lines, Inc., through its undersigned attorney, gives notice of the removal of the above captioned action to this Court of a State of Civil Action pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, and in support thereof avers as follows:

1. A civil action has been brought against defendants by the plaintiff in the Court of Common Pleas of Philadelphia County at No. 110803530. A copy of that Complaint is attached hereto as Exhibit "A".

2. The State Court where the action was originally filed is located in Philadelphia County, Pennsylvania, which is embraced within this judicial district.

3. The plaintiff was, at the time of the filing of this action, a citizen of the Commonwealth of Pennsylvania.

4. Defendant, Greyhound Lines, Inc. is a Delaware corporation with corporate headquarters located at 2221 E. Lamar Blvd., Suite 500, Arlington, Texas.

5. This action is for an amount in controversy in excess of statutory jurisdictional limit for arbitration, together with costs of this action and damages for delay.

6. If this action had been brought here initially, the United States District Court for the Eastern District of Pennsylvania would have original jurisdiction of the subject matter under 28 U.S.C. § 1332.

7. A Complaint in this action was served on the defendant. A copy of the Complaint is attached as Exhibit "A". No other process, pleadings or Orders have been served upon the defendant.

8. The statutory requirements having been met, the state action is properly removed to United States District Court for the Eastern District of Pennsylvania.

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By: /s/ Paul C. Troy Signature Code: PCT 1962
PAUL C. TROY, ESQUIRE

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ATTORNEY FOR DEFENDANT

Greyhound Lines, Inc.

DERRICK BRADLEY

vs.

GREYHOUND LINES, INC.

:

:

:

:

:

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY, PA

AUGUST TERM 2011

NO. 003530

PRAECIPE TO FILE COPY OF NOTICE OF REMOVAL

TO THE PROTHONOTARY:

As provided under 28 U.S.C. Section 1446(d), please file the attached as certified copy of Defendant Greyhound Lines, Inc.'s Notice of Removal filed in the United States Court for the Eastern District of Pennsylvania on _____.

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

BY: _____

PAUL C. TROY, ESQUIRE

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NOTICE TO PLAINTIFF

TO: Dennis A. Pomo, Esquire
Pasquarella, Kunnel & Pomo, P.C.
230 South Broad Street, Suite 1901
Philadelphia, PA 19102

PLEASE TAKE NOTICE that defendant, Greyhound Lines, Inc. has filed a Petition in the Eastern District of Pennsylvania for the removal of an action now pending in the Court of Common Pleas of Philadelphia County, entitled, Derrick Bradley v. Greyhound Lines, Inc.; No. 110803530.

FURTHER TAKE NOTICE that petitioner, Greyhound Lines, Inc. has at the same time filed with the United States District Court for the Eastern District of Pennsylvania, a copy of the Complaint served upon it, which was filed and entered in the Court of Common Pleas of Philadelphia County.

A copy of said Petition for Removal is attached to this Notice and is hereby served upon you.

KANE, PUGH, KNOELL, TROY & KRAMER LLP

BY: /s/ Paul C. Troy
PAUL C. TROY, ESQUIRE

KANE, PUGH, KNOELL, TROY & KRAMER LLP

BY: PAUL C. TROY, ESQUIRE

ATTORNEY I.D. NO. 60875

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CERTIFICATE OF SERVICE

I, Paul C. Troy, certify that on this date I served a true and correct copy of the Notice of Removal, Defendant's Disclosure Statement, my Entry of Appearance and Demand for Trial by Jury in the above-captioned matter on all counsel of record and unrepresented parties via U.S. First Class Mail, postage prepaid, as follows:

Dennis A. Pomo, Esquire
Pasquarella, Kunnel & Pomo, P.C.
230 South Broad Street, Suite 1901
Philadelphia, PA 19102

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By: /s/ Paul C. Troy Signature Code: PCT 1962
PAUL C. TROY, ESQUIRE

Date: 9/12/11

KANE, PUGH, KNOELL, TROY & KRAMER LLP
BY: PAUL C. TROY, ESQUIRE
ATTORNEY I.D. NO. 60875
510 SWEDE STREET
NORRISTOWN, PA 19401
(610) 275-2000

ATTORNEY FOR DEFENDANT
Greyhound Lines, Inc.

IN THE UNITED STATES DISTRICT COURT
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DERRICK BRADLEY	:	NO.
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GREYHOUND LINES, INC.	:	

DEFENDANTS' CERTIFICATE OF FILING OF
COPY OF NOTICE OF REMOVAL WITH THE STATE COURT

I, PAUL C. TROY, ESQUIRE, counsel for defendant Greyhound Lines, Inc. hereby certify that on this date a certified copy of Defendant's Notice of Removal will be filed with the Prothonotary of the Court of Common Pleas of Philadelphia County, Pennsylvania, wherein is pending the State Court action which is the subject of the removal.

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By: /s/ Paul C. Troy Signature Code: PCT 1962
PAUL C. TROY, ESQUIRE

Date: 9/12/11

KANE, PUGH, KNOELL, TROY & KRAMER LLP

BY: PAUL C. TROY, ESQUIRE

ATTORNEY I.D. NO. 60875

510 SWEDE STREET

NORRISTOWN, PA 19401

(610) 275-2000

ATTORNEY FOR DEFENDANT

Greyhound Lines, Inc.

IN THE UNITED STATES DISTRICT COURT
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ENTRY OF APPEARANCE

TO THE CLERK OF COURTS:

Kindly enter my appearance on behalf of **Defendant, Greyhound Lines, Inc.** in the
above-captioned matter.

/s/ Paul C. Troy Signature Code: PCT 1962

Paul C. Troy, Esquire

I.D. No. 60875

KANE, PUGH, KNOELL, TROY & KRAMER LLP

510 Swede Street

Norristown, PA 19401-4886

(610) 275-2000

ptroy@kanepugh.com

Date: 9/12/11

KANE, PUGH, KNOELL, TROY & KRAMER LLP

BY: PAUL C. TROY, ESQUIRE

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DEMAND FOR TRIAL BY A JURY OF TWELVE MEMBERS

TO THE CLERK OF COURTS:

Defendant, Greyhound Lines, Inc., by and through its attorneys, Kane, Pugh, Knoell, Troy & Kramer and Paul C. Troy, Esq. hereby requests a trial by a jury of twelve (12) plus two alternates; trial to proceed as long as there are twelve (12) members available.

/s/ Paul C. Troy Signature Code: PCT 1962

Paul C. Troy, Esquire

I.D. No. 60875

KANE, PUGH, KNOELL, TROY & KRAMER LLP

510 Swede Street

Norristown, PA 19401-4886

(610) 275-2000

ptroy@kanepugh.com

Date: 9/12/11

APPENDIX G

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DERRICK BRADLEY	:	NO.
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GREYHOUND LINES, INC.	:	

DISCLOSURE STATEMENT FORM

Please check one box:

- [] The nongovernmental corporate party, _____, in the above listed civil action does not have any parent corporation and publicly held corporation that owns 10% or more of its stock.
- [X] The nongovernmental corporate party, Greyhound Lines, Inc., improperly named as Greyhound Bus Lines, Inc., in the above listed civil action has the following parent corporation(s) and publicly held corporation(s) that owns 10% or more of its stock: It is a wholly owned subsidiary of Laidlaw Transportation Holdings, Inc.; Laidlaw Transportation, Inc. is a wholly owned subsidiary of FirstGroup International, Inc.; FirstGroup International, Inc. is an indirect, wholly owned subsidiary of FirstGroup America, Inc.; and FirstGroup America, Inc. is an indirect, wholly owned subsidiary of FirstGroup PLC; FirstGroup PLC is based in the United Kingdom and is traded on the London stock exchange

<u>9/12/11</u>	<u>/s/ Paul C. Troy</u>	<u>Signature Code: PCT 1962</u>
Date		Signature

Counsel for: Defendant Greyhound Lines, Inc.

Federal Rule of Civil Procedure 7.1 Disclosure Statement

(a) WHO MUST FILE: NONGOVERNMENTAL CORPORATE PARTY. A nongovernmental corporate party to an action or proceeding in a district court must file two copies of a statement that identifies any parent corporation and any publicly held corporation that owns 10% or more of its stock or states that there is no such corporation.

(b) TIME FOR FILING; SUPPLEMENTAL FILING. A party must:

- (1) file the Rule 7.1(a) statement with its first appearance , pleading, petition, motion, response, or other request addressed to the court, and
- (2) promptly file a supplemental statement upon any change in the information that the statement requires.